

## Exhibit A

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THE FORM)

**I. (a) PLAINTIFFS**

Sandy Ricketts

(b) County of Residence of First Listed Plaintiff Somers Point, NJ  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Jeffrey R. Lessin, Esquire/Mark T. Richter, Esquire  
Jeffrey R. Lessin & Associates, P.C  
1515 Market Street, Ste 714 Phila., PA 19102 (215) 599-1400

**DEFENDANTS**

Bieber Time Touring, LLC, Bieber Time Merchandise, LLC, Justin Bieber, and Patricia Mallette, c/o TSG Financial Management, LLC

County of Residence of First Listed Defendant Atlanta, GA

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Andrew F. Susko, Esquire/Daniel J. Ferhat, Esquire (215) 864-6228/6297  
White and Williams LLP  
1650 Market St., One Liberty Place, Ste 1800, Phila., PA 19103

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1. U.S. Government Plaintiff
- ☐ 2. U.S. Government Defendant
- ☐ 3. Federal Question (U.S. Government Not a Party)
- ☒ 4. Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                                   |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1            | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RS1 (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdiction statutes unless diversity):

28 U.S.C. Section 1332(a)(1) and Section 1441(a)

Brief description of cause:

Premises liability/negligence. Court has subject matter jurisdiction because there is diversity of citizenship and because the matter in controversy exceeds the sum or value of \$75,000.00.

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

8-18-15

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: Sandy Ricketts, 514 Fifth Street, Somers Point, NJ 08244

Address of Defendant: Bieber Time Touring, LLC, c/o TSG Financial Management, LLC, 133 Peachtree Street, Suite 4070, Atlanta, GA 30303

Place of Accident, Incident or Transaction: Philadelphia, PA

(Use Reverse Side for Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)).

Yes ☒ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Security Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(please specify) \_\_\_\_\_

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☒ Other Personal Injury (Please specify) Premises liability  
(not to exceed \$150,000.00)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All Other Diversity Cases  
(Please specify) \_\_\_\_\_

ARBITRATION CERTIFICATION

(Check appropriate category)

I, Andrew F. Susko/Daniel J. Ferhat \_\_\_\_\_, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☐ Relief other than monetary damages is sought.

DATE: 8/18/15

Andrew F. Susko/Daniel J. Ferhat  
Attorney-at-Law

35664/89174  
Attorney I.D. #

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 8/18/15

Andrew F. Susko/Daniel J. Ferhat  
Attorney-at-Law

35664/89174  
Attorney I.D. #

CIV. 609 (5/2012)

15806353v.1

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: Sandy Ricketts, 514 Fifth Street, Somers Point, NJ 08244

Address of Defendant: Bieber Time Touring, LLC, c/o TSG Financial Management, LLC, 133 Peachtree Street, Suite 4070, Atlanta, GA 30303

Place of Accident, Incident or Transaction: Philadelphia, PA

(Use Reverse Side for Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)).

Yes ☒ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Security Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(please specify) \_\_\_\_\_

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☒ Other Personal Injury (Please specify) Premises liability  
(not to exceed \$150,000.00)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All Other Diversity Cases  
(Please specify) \_\_\_\_\_

ARBITRATION CERTIFICATION

(Check appropriate category)

I, Andrew F. Susko/Daniel J. Ferhat, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☐ Relief other than monetary damages is sought.

DATE: 8/18/15

Andrew F. Susko/Daniel J. Ferhat  
Attorney-at-Law

35664/89174  
Attorney I.D. #

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 8/18/15

Andrew F. Susko/Daniel J. Ferhat  
Attorney-at-Law

35664/89174  
Attorney I.D. #

CIV. 609 (5/2012)

15806353v.1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Sandy Ricketts	:	CIVIL ACTION
	:	
v.	:	
Bieber Time Touring, LLC, Bieber Time	:	
Merchandise , LLC, Justin Bieber, and	:	NO.
Patricia Mallette	:	

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (x)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management -- Cases that do not fall into any one of the other tracks. ( )

8-18-15	Andrew F. Susko/ Daniel J. Ferhat	Defendants
<hr/>	<hr/>	<hr/>
<b>Date</b>	<b>Attorney-at-law</b>	<b>Attorney for Defendants</b>
215-864-6228/6297	(215) 789-7528	suskoa@whiteandwilliams.com ferhatd@whiteandwilliams.com
<hr/>	<hr/>	<hr/>
<b>Telephone</b>	<b>Fax Number</b>	<b>E-mail Address</b>

***IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

## SANDY RICKETTS

*Plaintiff,*

v.

***BIEBER TIME TOURING, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; BIEBER  
TIME MERCHANDISE, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; JUSTIN  
BIEBER, c/o TSG FINANCIAL MANAGEMENT,  
LLC; AND PATRICIA MALLETTE, c/o TSG  
FINANCIAL MANAGEMENT, LLC***

***Defendants.***

**CIVIL ACTION**

***NO:***

## NOTICE OF REMOVAL

**TO THE HONORABLE JUDGES OF THE SAID DISTRICT COURT OF THE UNITED STATES:**

Defendants, Bieber Time Touring, LLC, c/o TSG Financial Management, LLC; Bieber Time Merchandise, LLC, c/o TSG Financial Management, LLC; Justin Bieber, c/o TSG Financial Management, LLC; and Patricia Mallette, c/o TSG Financial Management, LLC, in the above-captioned matter file this Notice of Removal of the case from the Court of Common Pleas of Philadelphia County, in which it is now pending, to the United States District Court for the Eastern District of Pennsylvania, and in support thereof, aver as follows:

1. This premises liability action was commenced, on July 8, 2015, by way of Complaint filed in the Court of Common Pleas of Philadelphia County, Pennsylvania and docketed as No. 150700613, July Term 2015, No. 00613. A copy of the Complaint is attached hereto and marked as Exhibit "A".

2. Defendants were served a copy of the Complaint via certified mail on July 20, 2015. Copies of the Affidavits of Service referable to each Defendant are attached hereto collectively as Exhibit “B”.

3. Defendants hereby exercise their rights under the provisions of 28 U.S.C. §1441, *et seq.*, and based on complete diversity of citizenship between the parties, to remove this action from the Court of Common Pleas of Philadelphia County, Pennsylvania, in which this case is presently pending.

4. Plaintiff alleges in the Complaint that Defendants failed to maintain their premises in a safe condition which resulted in a fall and caused serious personal injuries. Plaintiff filed this case as a major jury, non-arbitration, matter seeking damages for past and future pain and suffering, past and future medical bills, and damages for personal injuries identified in more detail in paragraph 5 below.

5. Specifically, Plaintiff alleges in the Complaint that she “suffered severe and permanent injuries to her person, including but not limited to: left scaphoid fracture; a laceration of her lower lip requiring surgical repair; contusions and sprains of her left wrist and hand; injuries to her teeth; nervous shock and aggravation and/or exacerbation of all known and unknown preexisting medical conditions.” Plaintiff seeks damages in her Complaint in excess of \$50,000.00.

6. The present lawsuit is removable from the state court to the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. §1332(a)(1) and §1441(a) because the controversy in this action is between Plaintiff, a citizen of the State of New Jersey, and Defendants, all of whom are citizens of a foreign state. Diversity is established as follows:

- (a) Plaintiff, Sandy Ricketts, resides at 514 Fifth Street, Somers Point, New Jersey, and, therefore, is a citizen of the State of New Jersey.

- (b) Bieber Time Touring, LLC, c/o TSG Financial Management, LLC was a Delaware corporation at all times material hereto with its principal place of business located in the State of Georgia.
- (c) Bieber Time Merchandise, LLC, c/o TSG Financial Management, LLC was a Delaware corporation at all times material hereto with its principal place of business located in the State of Georgia.
- (d) Justin Bieber, c/o TSG Financial Management, LLC, is a citizen of the State of California.
- (e) Patricia Mallette, c/o TSG Financial Management, LLC, is a citizen Ontario, Canada.

7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332, because there is diversity of citizenship and because the allegations of the Complaint, including damages sought by Plaintiff, reveal that the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of costs.

8. Pursuant to the provisions of 28 U.S.C. § 1446(a), Defendants have attached herewith and incorporate by reference a copy of the Complaint filed in the Philadelphia Court of Common Pleas in this action.

9. Defendants will provide immediate notice of the filing of this Notice to Plaintiff as required by 28 U.S.C. § 1446(d).

10. Defendants will file a certified copy of this Notice with the Prothonotary of the Court of Common Pleas of Philadelphia County as required by 28 U.S.C. §1446(d).



**WHEREFORE**, Defendants request that the action presently pending in the Court of Common Pleas of Philadelphia County be removed to the United States District Court for the Eastern District of Pennsylvania.

**WHITE AND WILLIAMS LLP**  
**Attorneys for Defendants**

By: AFS 3209  
**Andrew F. Susko, Esquire**  
**Daniel J. Ferhat, Esquire**  
**Attorney I.D. No. 35664/89174**  
**1650 Market Street**  
**One Liberty Place, Suite 1800**  
**Philadelphia, PA 19103-7395**  
**(215) 864-6228 / 6297**  
[suskoa@whiteandwilliams.com](mailto:suskoa@whiteandwilliams.com)  
[ferhatd@whiteandwilliams.com](mailto:ferhatd@whiteandwilliams.com)

Dated: August 18, 2015

***IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

## SANDY RICKETTS

*Plaintiff,*

v.

***BIEBER TIME TOURING, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; BIEBER  
TIME MERCHANDISE, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; JUSTIN  
BIEBER, c/o TSG FINANCIAL MANAGEMENT,  
LLC; AND PATRICIA MALLETTE, c/o TSG  
FINANCIAL MANAGEMENT, LLC***

*Defendants.*

**CIVIL ACTION**

*NO:*

**NOTICE TO PLAINTIFF**

TO: Sandy Rickets, c/o  
Jeffrey R. Lessin, Esquire  
Mark T. Richter, Esquire  
1515 Market Street, Suite 714  
Philadelphia, PA 19102

***PLEASE*** take notice that Defendants have filed a Notice in the United States District Court for the Eastern District of Pennsylvania for removal of an action now pending in the Court of Common Pleas of Philadelphia, Pennsylvania, captioned Sandy Rickets v. Bieber Time Touring, LLC, c/o TSG Financial Management, LLC, et al., July term, 2015, No. 00613.

***FURTHER***, take notice that the Defendants have at the same time filed electronically with the United States District Court for the Eastern District of Pennsylvania a copy of the Complaint which was filed and entered in the Court of Common Pleas of Philadelphia County. A copy of said Notice of Removal is attached to this Notice and is hereby served upon you.

***WHITE AND WILLIAMS LLP***  
***Attorneys for Defendants***

By: AFS 3209  
**Andrew F. Susko, Esquire**  
**Daniel J. Ferhat, Esquire**  
***Attorney I.D. No. 35664/89174***  
***1650 Market Street***  
***One Liberty Place, Suite 1800***  
***Philadelphia, PA 19103-7395***  
***(215) 864-6228 / 6297***  
[suskoa@whiteandwilliams.com](mailto:suskoa@whiteandwilliams.com)  
[ferhatd@whiteandwilliams.com](mailto:ferhatd@whiteandwilliams.com)

Dated: August 18, 2015

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SANDY RICKETTS**

**Plaintiff,**

**v.**

**BIEBER TIME TOURING, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; BIEBER  
TIME MERCHANDISE, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; JUSTIN  
BIEBER, c/o TSG FINANCIAL MANAGEMENT,  
LLC; AND PATRICIA MALLETTE, c/o TSG  
FINANCIAL MANAGEMENT, LLC  
Defendants.**

**CIVIL ACTION**

**NO:**

**PROOF OF FILING**

**TO THE CLERK OF THE COURT:**

**Andrew F. Susko, Esquire**, hereby certifies that a copy of the foregoing Notice of Removal will be filed with the Prothonotary of the Philadelphia County Court of Common Pleas immediately upon receipt of the electronic filing from the United States District Court for the Eastern District of Pennsylvania.

**WHITE AND WILLIAMS LLP  
Attorneys for Defendants**

By: AFS 3209  
**Andrew F. Susko, Esquire**  
**Daniel J. Ferhat, Esquire**  
**Attorney I.D. No. 35664/89174**  
**1650 Market Street**  
**One Liberty Place, Suite 1800**  
**Philadelphia, PA 19103-7395**  
**(215) 864-6228 / 6297**  
[suskoa@whiteandwilliams.com](mailto:suskoa@whiteandwilliams.com)  
[ferhatd@whiteandwilliams.com](mailto:ferhatd@whiteandwilliams.com)

Dated: August 18, 2015

**VERIFICATION**

*Andrew F. Susko, Esquire*, hereby states that he is an attorney for Defendants, Bieber Time Touring, LLC, c/o TSG Financial Management, LLC; Bieber Time Merchandise, LLC, c/o TSG Financial Management, LLC; Justin Bieber, c/o TSG Financial Management, LLC; and Patricia Mallette, c/o TSG Financial Management, LLC, in the within action and verifies that the statements made in the foregoing Notice of Removal are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

AFS 3209  
*Andrew F. Susko, Esquire*

Dated: August 18, 2015

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SANDY RICKETTS**

***Plaintiff,***

***v.***

***BIEBER TIME TOURING, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; BIEBER  
TIME MERCHANDISE, LLC, c/o TSG  
FINANCIAL MANAGEMENT, LLC; JUSTIN  
BIEBER, c/o TSG FINANCIAL MANAGEMENT,  
LLC; AND PATRICIA MALLETTE, c/o TSG  
FINANCIAL MANAGEMENT, LLC***

***Defendants.***

***CIVIL ACTION***

***NO:***

**CERTIFICATE OF SERVICE**

I, Andrew F. Susko, Esquire, hereby certify that true and correct copy of the foregoing Notice of Removal was filed with the Clerk on this date and a true and correct copy has been mailed via first class mail to the following counsel of record:

Jeffrey R. Lessin, Esquire  
Mark T. Richter, Esquire  
Jeffrey R. Lessin & Associates, P.C.  
1515 Market Street, Suite 714  
Philadelphia, PA 19102

***WHITE AND WILLIAMS LLP  
Attorneys for Defendants***

By: AFS 3209  
**Andrew F. Susko, Esquire  
Daniel J. Ferhat, Esquire  
Attorney I.D. No. 35664/89174  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103-7395  
(215) 864-6228 / 6297  
[suskoa@whiteandwilliams.com](mailto:suskoa@whiteandwilliams.com)  
[ferhatd@whiteandwilliams.com](mailto:ferhatd@whiteandwilliams.com)**

Dated: August 18, 2015

# EXHIBIT “A”

JEFFREY R. LESSIN & ASSOCIATES, P.C.  
 BY: JEFFREY R. LESSIN, ESQUIRE  
 I.D. #: 43801  
 BY: MARK T. RICHTER, ESQUIRE  
 I.D. #: 45195  
 1515 MARKET STREET, SUITE 714  
 PHILADELPHIA, PA 19102  
 215-599-1400

SANDY RICKETTS  
 514 Fifth Street  
 Somers Point New Jersey 08244  
 vs.

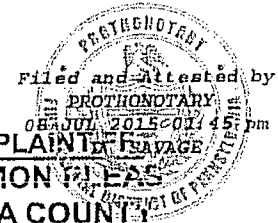
BIEBER TIME TOURING, LLC  
 c/o TSG FINANCIAL MANAGEMENT, LLC  
 133 Peachtree Street, Suite 4070  
 Atlanta, GA 30303

and  
 BIEBER TIME MERCHANDISE, LLC  
 c/o TSG FINANCIAL MANAGEMENT, LLC  
 133 Peachtree Street, Suite 4070  
 Atlanta, GA 30303

and  
 JUSTIN BIEBER  
 c/o TSG FINANCIAL MANAGEMENT, LLC  
 133 Peachtree Street, Suite 4070  
 Atlanta, GA 30303

and  
 PATRICIA MALLETTE  
 c/o TSG FINANCIAL MANAGEMENT, LLC  
 133 Peachtree Street, Suite 4070  
 Atlanta, GA 30303

This is NOT an ARBITRATION MATTER.  
 ASSESSMENT OF DAMAGES REQUIRED.  
 JURY TRIAL DEMANDED



ATTORNEYS FOR PLAINTIFFS  
 : COURT OF COMMON PLEAS  
 : OF PHILADELPHIA COUNTY

: JULY TERM, 2015

: No. :

**CIVIL ACTION - COMPLAINT - NOTICE TO DEFEND**  
**2S - PREMISES LIABILITY- SLIP AND FALL**  
 NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association  
 Lawyer Referral and Information Service  
 One Reading Center  
 Philadelphia, Pennsylvania 19107  
 (215) 238-1701

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINA SIGUIENTES, USTED TIENE VIENTE (20) DIAS, DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICATION. HACE FALTA ASENTAR UNA COMPARENCIA ESCRITA O EN FORMA ESCRITA SUS DEFNSAS O SUS OBJECIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION ADEMAS, LA CORTE PUEDE DICI DIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES O OTROS DERECHOS IMPORTANTANT PARA USTED. LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATEMENTE. SI NO TIENE ABOGADO O SIO TIENE EL DINERO SUFICIENTE DE TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL

Asociacion de Liceneados de Filadelfia  
 Servicio de Referencia e Informacion Legal  
 One Reading Center  
 Filadelfia, Pennsylvania 19107  
 (215) 238-1701



JEFFREY R. LESSIN & ASSOCIATES, P.C.  
BY: JEFFREY R. LESSIN, ESQUIRE  
I.D. #: 43801  
BY: MARK T. RICHTER, ESQUIRE  
I.D. #: 45195  
1515 MARKET STREET, SUITE 714  
PHILADELPHIA, PA 19102  
215-599-1400

This is not an Arbitration Matter  
Assessment of Damages Required  
Jury Trial Demanded

**SANDY RICKETTS**  
514 Fifth Street  
Somers Point New Jersey 08244

ATTORNEYS FOR PLAINTIFF  
: COURT OF COMMON PLEAS  
OF PHILADELPHIA COUNTY

vs.

**BIEBER TIME TOURING, LLC**  
c/o TSG FINANCIAL MANAGEMENT, LLC  
133 Peachtree Street, Suite 4070  
Atlanta, GA 30303

: JULY TERM, 2015

and

**BIEBER TIME MERCHANDISE, LLC**  
c/o TSG FINANCIAL MANAGEMENT, LLC  
133 Peachtree Street, Suite 4070  
Atlanta, GA 30303

and

**JUSTIN BIEBER**  
c/o TSG FINANCIAL MANAGEMENT, LLC  
133 Peachtree Street, Suite 4070  
Atlanta, GA 30303

and

**PATRICIA MALLETTE**  
c/o TSG FINANCIAL MANAGEMENT, LLC  
133 Peachtree Street, Suite 4070  
Atlanta, GA 30303

: No. :

CIVIL ACTION - COMPLAINT - NOTICE TO DEFEND  
2S - PREMISES LIABILITY- SLIP AND FALL

CIVIL ACTION - COMPLAINT

1. Plaintiff, **SANDY RICKETTS**, is an adult individual residing at 514 Fifth Street, Somers Point, NJ 08244.

2. Defendant **BIEBER TIME TOURING, LLC**, is a limited partnership, partnership,

or other business entity, organized in the State of Delaware and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303.

3. Defendant **BIEBER TIME MERCHANDISE, LLC**, is a limited partnership, partnership, or other business entity, organized in the State of Delaware and doing business in the Commonwealth of Pennsylvania, with offices, property and/or personnel located at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303.

4. Defendant **JUSTIN BIEBER** is an adult individual, residing in Stratford, Ontario, Canada. At all times relevant hereto, **JUSTIN BIEBER** was an owner, manager, officer, partner, principal or employee of the business entities known as **BIEBER TIME TOURING, LLC** and/or **BIEBER TIME MERCHANDISE, LLC**, who regularly conducted business in Philadelphia, Pennsylvania, and who was a signatory to a contract with AEG LIVE, LLC, dated January 31, 2012 and amendments thereof dated December 13, 2012 and April 18, 2013, which pertained to a series of concert performances identified as "The Justin Bieber: Believe" tour and which applied to a performance that took place at the Wells Fargo Center in Philadelphia, Pennsylvania on July 17, 2013. Defendant **JUSTIN BIEBER** is amenable to service of process at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303, c/o TSG Financial Management, LLC.

5. Defendant **PATRICIA MALLETTE** is an adult individual, residing in Stratford, Ontario, Canada. At all times relevant hereto, **PATRICIA MALLETTE** was an owner, manager, officer, partner, principal or employee of the business entities known as **BIEBER TIME TOURING, LLC** and/or **BIEBER TIME MERCHANDISE, LLC**, who regularly conducted business in Philadelphia, Pennsylvania, and who was a signatory to a contract

with AEG LIVE, LLC, dated January 31, 2012 which pertained to a series of concert performances identified as "The Justin Bieber: Believe" tour and which applied to a performance that took place at the Wells Fargo Center in Philadelphia, Pennsylvania on July 17, 2013. Defendant **PATRICIA MALLETTE** is amenable to service of process at 133 Peachtree Street, Suite 4070, Atlanta, GA 30303, c/o TSG Financial Management, LLC.

6. On July 17, 2013, Plaintiff **SANDY RICKETTS** was a patron and a business invitee who was lawfully in the Wells Fargo Center premises in Philadelphia, Pennsylvania while attending a Justin Bieber concert.

7. At all times material hereto, the Defendants acted by and through their agents, servants, workmen and/or employees all of whom were acting within the scope of their agency and/or authority.

8. At all times material hereto, each of the Defendants had a duty to keep the aforesaid premises free of unreasonably hazardous defects and conditions and safe for business invitees such as the Plaintiff.

9. On the aforesaid date, the Defendants, by and through their agents, servants, workmen and/or employees, knew and/or should have known of the existence of the hazardous condition of the premises as described below.

10. On July 17, 2013, at the time of the Justin Bieber concert, there existed in the walkways of the aforesaid premises, obstructions, defects and irregularities, particularly in the form of electrical cables and/or wires that had been placed or strung about and across the said walkways by the Defendants' agents, servants, workmen or employees that created a danger, menace, nuisance, trap and/or trip hazard to persons lawfully upon said premises.

11. On July 17, 2013, the Plaintiff, **SANDY RICKETTS**, was caused to trip, stumble and fall as a result of coming in contact with the aforementioned defective and hazardous condition then existing upon the aforesaid premises, and to suffer serious injuries more fully hereinafter described.

**COUNT I**  
**SANDY RICKETTS vs. DEFENDANTS**

12. The averments of paragraphs one (1) through eleven (11), inclusive, are incorporated herein and made a part hereof.

13. The Defendants, individually and/or jointly, by and through their agents, servants, workmen and/or employees, acting in the course of their employment and within the scope of their authority, knew or should have known of the existence of the aforementioned defect prior to the Plaintiff's fall and the Defendants had a duty to correct, remedy, repair, warn of and/or eliminate the said defect.

14. The carelessness and negligence of the Defendants consisted of the following:

- a. Failing to properly inspect the said premises and adjacent areas;
- b. Failing to warn pedestrians of the dangerous condition of the walkway of which the Defendants were aware or should have been aware;
- c. Failing to select and hire competent contractors to maintain the walkways, and/or walking area in said premises;
- d. Failing to maintain the premises and/or walkways in a condition which would protect and safeguard individuals lawfully upon the premises and prevent them from falling;
- e. Allowing and causing the electrical cables or wires on the aforesaid

premises to extend across walkways and to constitute a menace, danger, nuisance, trap and/or trip hazard to persons lawfully on the premises;

- f. Allowing a condition to exist which was in violation of the ordinances of the municipality and the Commonwealth of Pennsylvania related to safety requirements for walking surfaces;
  - g. Failing to maintain walkways in compliance with the laws of the municipality and the Commonwealth of Pennsylvania;
  - h. Failing to keep the walkways free of defects obstructions and debris;
  - i. Failing to effectively clear the walkways of the above-mentioned area of wires, cables, folding chairs and/or debris before the arrival of business invitees;
  - j. Failing to eliminate the dangerous condition and to guard or warn pedestrians of the hazard at the premises;
  - l. Failing to maintain the premises reasonably free from trip hazzards along foreseeable pedestrian paths at, near, or adjacent to the means of ingress and egress to the premises and its seating areas;
- 
- m. Allowing a condition to exist which was in violation of the ordinances and/or codes of the municipality and/or the Commonwealth of Pennsylvania, and/or applicable national and international codes in relation to walkways on commercial properties and/or properties open to the public;
  - n. Breaching their duty to monitor the site conditions;

- o. Failing to perform reasonable and timely site inspections; and
- p. Failing to appropriately provide ushers or security personnel to assist concert goers who were heading toward their seats.

15. By reason of the aforesaid negligence of the Defendants as stated above, the Plaintiff, **SANDY RICKETTS**, suffered severe and permanent injuries to her person, including but not limited to: left scaphoid fracture; a laceration of her lower lip requiring surgical repair; contusions and sprains of her left wrist and hand; injuries to her teeth; nervous shock and aggravation and/or exacerbation of all known and unknown preexisting medical conditions. The Plaintiff, **SANDY RICKETTS**, suffered severe aches pains, mental anxiety and anguish, and a severe shock to her entire nervous system, and other injuries the full extent of which are not yet known. She has in the past and will in the future undergo severe pain and suffering and will in the future be unable to attend to her usual duties and occupation, all to her great financial detriment and loss. The Plaintiff, **SANDY RICKETTS**, believes and therefore avers that her injuries are permanent in nature.

16. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for surgeries, medicine, therapy and medical attention and may be required to expend additional sums for the same purposes in the future.

17. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has been prevented from attending to her usual and daily activities and duties, and may be so prevented for an indefinite time in the future, all to her great financial detriment and loss.

18. As a result of the aforesaid occurrence, the Plaintiff, **SANDY RICKETTS**, has suffered physical pain and mental anguish and humiliation and she may continue to suffer

same for an indefinite period of time in the future.

**WHEREFORE**, Plaintiff, **SANDY RICKETTS**, demands damages of the Defendants, jointly and severally herein, in a sum in excess of **FIFTY THOUSAND (\$50,000.00) DOLLARS**, plus costs.

**JEFFREY R. LESSIN & ASSOCIATES, P.C.**

BY: Jeffrey R. Lessin  
JEFFREY R. LESSIN, ESQUIRE  
MARK T. RICHTER, ESQUIRE  
Attorneys for Plaintiff

Date: July 7 , 2015

# EXHIBIT “B”



### AFFIDAVIT OF VICTORIA FREEDMAN

Victoria Freedman, being sworn according to law, deposes and says as follows:


1. She is an adult individual and Paralegal for the law firm of Jeffrey R. Lessin & Associates, P.C.

2. On July 15, 2015 she did place into the USPS mailbox located at the concourse level of 1515 Market Street, Philadelphia, PA mail a true and correct time stamped copy of Plaintiff's Complaint to Defendant, Patricia Mallette c/o TSG Financial Management, LLC. at 133 Peachtree Street, Suite 4070 Atlanta, GA 30303, via certified mail, No. 7012 2920 0000 6706 5274 A true and correct copy of the transmittal letter is attached hereto as Exhibit A.

3. According to the green return card attached hereto, Plaintiff's Complaint was delivered to Defendant on July 20, 2015. See Exhibit B


That she has read the above statement and they are true and correct to the best of her knowledge, information and belief.

Sworn to me this 24<sup>th</sup> day of July, 2015

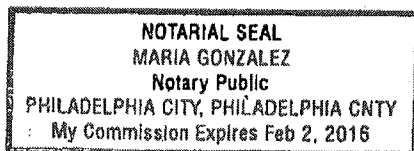
  
\_\_\_\_\_

Notary Public

My Commission Expires: 2/2/2016

  
\_\_\_\_\_

VICTORIA FREEDMAN  
JEFFREY R. LESSIN & ASSOCIATES, P.C.  
July 24, 2015



### AFFIDAVIT OF VICTORIA FREEDMAN

Victoria Freedman, being sworn according to law, deposes and says as follows:

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3. According to the green return card attached hereto, Plaintiff's Complaint was delivered to Defendant on July 20, 2015. See Exhibit B

That she has read the above statement and they are true and correct to the best of her knowledge, information and belief.

Sworn to me this 24<sup>th</sup> day of July, 2015

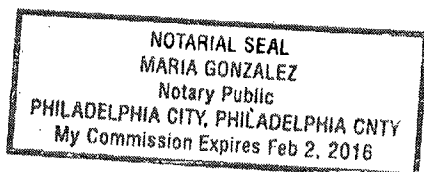


Notary Public

My Commission Expires: 2/2/2016



VICTORIA FREEDMAN  
JEFFREY R. LESSIN & ASSOCIATES, P.C.  
July 24, 2015



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3. According to the green return card attached hereto, Plaintiff's Complaint was delivered to Defendant on July 20, 2015. See Exhibit B

That she has read the above statement and they are true and correct to the best of her knowledge, information and belief.

Sworn to me this 24<sup>th</sup> day of July, 2015

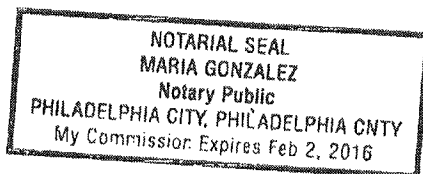


Notary Public

My Commission Expires: 2/2/2016



VICTORIA FREEDMAN  
JEFFREY R. LESSIN & ASSOCIATES, P.C.  
July 24, 2015



## AFFIDAVIT OF VICTORIA FREEDMAN

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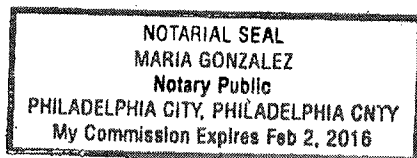
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That she has read the above statement and they are true and correct to the best of her knowledge, information and belief.

Sworn to me this 24<sup>th</sup> day of July, 2015

Notary Public

My Commission Expires: 2/2/2016



  
VICTORIA FREEDMAN  
JEFFREY R. LESSIN & ASSOCIATES, P.C.  
July 24, 2015